

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. CR 2:25-00434-JLS

Plaintiff,

AMENDED PROTECTIVE ORDER REGARDING  
DISCOVERY CONTAINING PERSONAL  
IDENTIFYING INFORMATION, MEDICAL  
INFORMATION, PRIVACY ACT  
INFORMATION, AND CONFIDENTIAL  
INFORMANT, COOPERATING WITNESS,  
AND COOPERATING DEFENDANT  
INFORMATION

v.

ARA ARTUNI, ET AL.,

Defendants.

The Court has read and considered the parties' Stipulation for a Protective Order Regarding Discovery Containing Personal Identifying Information ("PII"), Medical Information, Privacy Act Information ("PAI"), and Confidential Informant ("CI"), Cooperating Witness ("CW"), and Cooperating Defendant Information, filed by the government and defendant ARA ARTUNI, also known as ("aka") "Ara Harutyunyan," aka "Aro," aka "Araboyi," aka "Arabo," aka "Santos," ("defendant ARTUNI"), defendant ALEX AGOPIAN aka "Alik," ("defendant AGOPIAN"), defendant VAHAGN STEPANYAN, aka "Vee," aka "Vova Titov," aka "Juha Alver," aka "Vahan Stephanian," aka "Aso Balvanov," ("defendant STEPANYAN"), defendant ARVIN ALBERT KAZARYAN, aka

1 "Artur," aka "Art," ("defendant KAZARYAN"), defendant MANUK MANUKYAN  
2 ("defendant MANUKYAN"), and defendant LEVON ARAKELYAN ("defendant  
3 ARAKELYAN"), (collectively the "defendants"), in this matter on  
4 August 6, 2025, which this Court incorporates by reference into this  
5 order, and FOR GOOD CAUSE SHOWN the Court hereby FINDS AND ORDERS as  
6 follows:

7       1. The government's discovery in this case relates to  
8 defendants' alleged crimes, that is, violations of 18 U.S.C. §  
9 1962(d): Racketeer Influenced and Corrupt Organizations Conspiracy;  
10 18 U.S.C. §§ 1959(a)(3), (a)(5): Violent Crimes in Aid of  
11 Racketeering Activity; 18 U.S.C. § 1349: Conspiracy to Commit Wire  
12 Fraud and Bank Fraud; 18 U.S.C. § 371: Conspiracy to Commit Theft  
13 from Interstate and Foreign Shipments; 18 U.S.C. § 922(g)(1): Felon  
14 in Possession of Firearms and Ammunition; 18 U.S.C. § 922(o)(1):  
15 Possession of Machineguns; 26 U.S.C. § 5861(d): Possession of  
16 Unregistered Firearms; and 26 U.S.C. § 5861(i): Possession of  
17 Firearms Not Identified by a Serial Number.

18       2. A protective order for the discovery is necessary so that  
19 the government can produce to the defense materials regarding  
20 confidential informants ("CI"), cooperating witnesses ("CW"), and/or  
21 cooperating defendants who participated in the government's  
22 investigation and who may testify at trial. Because these materials  
23 could be used to identify the confidential informants, cooperating  
24 witnesses, and/or cooperating defendants, the Court finds that the  
25 unauthorized dissemination or distribution of the materials may (1)  
26 compromise the ability of such person(s) to participate effectively  
27 in the instant matter, (2) compromise the ability of such person(s)  
28 to participate in future investigations in an undercover capacity,

1 and/or (3) expose him/her and/or his/her family to potential safety  
2 risks.

3       3. A protective order for the discovery is also necessary so  
4 that the government can produce to the defense materials containing  
5 third parties' PII and medical information. The Court finds that  
6 disclosure of this information without limitation risks the privacy  
7 and security of the information's legitimate owners. The medical  
8 information at issue may also be subject to various federal laws  
9 protecting the privacy of medical records, including provisions of  
10 the Privacy Act, 5 U.S.C. § 552a; provisions of 45 C.F.R.  
11 §§ 164.102-164.534; and/or provisions of 42 U.S.C. § 1306. Because  
12 the government has an ongoing obligation to protect third parties'  
13 PII and medical information, the government cannot produce to any  
14 defendant an unredacted set of discovery containing this information  
15 without this Court entering the Protective Order. Moreover, PII and  
16 medical information make up a significant part of the discovery in  
17 this case and such information itself, in many instances, has  
18 evidentiary value. If the government were to attempt to redact all  
19 this information in strict compliance with Federal Rule of Criminal  
20 Procedure 49.1, the Central District of California's Local Rules  
21 regarding redaction, and the Privacy Policy of the United States  
22 Judicial Conference, the defense would receive a set of discovery  
23 that would be highly confusing and difficult to understand, and it  
24 would be challenging for defense counsel to adequately evaluate the  
25 case, provide advice to their respective defendant, or prepare for  
26 trial.

27       4. An order is also necessary because the government intends  
28 to produce to the defense materials that may contain information

1 within the scope of the Privacy Act, 5 U.S.C. § 552a ("Privacy Act  
2 Information"). The Court finds that, to the extent that these  
3 materials contain Privacy Act information, disclosure is authorized  
4 pursuant to 5 U.S.C. § 552a(b)(11).

5       5. The purpose of this Protective Order is therefore to  
6 (a) allow the government to comply with its discovery obligations  
7 while protecting this sensitive information from unauthorized  
8 dissemination, and (b) provide defense counsel with sufficient  
9 information to adequately represent their respective defendant.

10       6. Accordingly, the discovery that the government will  
11 provide to defense counsel in the above-captioned case will be  
12 subject to this Protective Order, as follows:

13           a. "Victim Information" includes information relating to  
14 any and all "means of identification" of a victim and his/her family  
15 members under 18 U.S.C. § 1028(d)(7), and further includes, but is  
16 not limited to, PII Materials, Privacy Act Information, Medical  
17 Materials, and any and all identifying statements made by a victim  
18 that were audio and/or video recorded, summarized in reports or  
19 affidavits, and/or contained in transcripts of recordings that were  
20 made in English or translated from any foreign language, including, but  
21 not limited to, Spanish, Armenian, and/or Russian, to English.

22           b. "Witness Information" includes information relating  
23 to any and all "means of identification" of a witness and his/her  
24 family members under 18 U.S.C. § 1028(d)(7), and further includes, but  
25 is not limited to, PII Materials, Privacy Act Information, Medical  
26 Materials, and any and all identifying statements made by a witness  
27 that were audio and/or video recorded, summarized in reports or  
28 affidavits, and/or contained in transcripts of recordings that were

1 made in English or translated from any foreign language, including, but  
2 not limited to, Spanish, Armenian, and/or Russian, to English.

3           c. "Cooperating Informant or Witness Information"  
4 includes information relating to any and all "means of  
5 identification" of a CI or CW and his/her family members under 18  
6 U.S.C. § 1028(d)(7), and further includes, but is not limited to, PII  
7 Materials, Privacy Act Information, Medical Materials, nicknames,  
8 law enforcement identifiers (e.g., confidential human source names  
9 and/or numbers), and any and all identifying statements made by a CI  
10 or CW that were audio and/or video recorded, summarized in reports or  
11 affidavits, and/or contained in transcripts of recordings that were  
12 made in English or translated from any foreign language, including, but  
13 not limited to, Spanish, Armenian, and/or Russian, to English.

14           d. "Cooperating Defendant Information" includes any and  
15 all information relating to any "means of identification" of a  
16 cooperating defendant and his/her family members under 18 U.S.C. §  
17 1028(d)(7), and further includes, but is not limited to, PII  
18 Materials, Privacy Act Information, Medical Materials, nicknames,  
19 and/or law enforcement identifiers (e.g., confidential human source  
20 names and/or numbers), and any and all identifying statements made by  
21 a cooperating defendant that were audio and/or video recorded,  
22 summarized in reports or affidavits, and/or contained in transcripts  
23 of recordings that were made in English or translated from any foreign  
24 language, including, but not limited to, Spanish, Armenian, and/or  
25 Russian, to English.

26           e. "CI Materials" includes, but is not limited to, PII  
27 Materials, Privacy Act Information, and Medical Materials.

1               f. "PII Materials" includes any and all information that  
2 can be used to identify any person, including, but not limited to, a  
3 name, address, date of birth, Social Security number, driver's  
4 license number, telephone number, account number, email address, or  
5 personal identification number.

6               g. "Medical Materials" includes any and all individually  
7 identifiable health information that is connected to a patient's  
8 name, address, or other identifying number, such as a Social  
9 Security number or Medicare/Medi-Cal number.

10              h. "Attorney's Eyes Only ("AEO") Materials" includes  
11 Victim Information, Witness Information, Cooperating Informant or  
12 Witness Information, and Cooperating Defendant Information, in  
13 addition to any and all information relating to a CI, CW, and/or  
14 defendant's current and prior history of cooperation with law  
15 enforcement, current and prior criminal history, statements, or any  
16 other information that could be used to identify a CI, CW, and/or  
17 cooperating defendant, including, but not limited to, a name,  
18 nickname, image, address, date of birth, or unique personal  
19 identification number, such as a Social Security number, law  
20 enforcement number, driver's license number, account number, and/or  
21 telephone number.

22              i. "Confidential Information" refers to any document or  
23 information containing: CI Materials, Privacy Act Information, PII  
24 Materials, and/or Medical Materials that the government produces to  
25 the defense pursuant to this Protective Order and any copies  
26 thereof.

27              j. "AEO Information" refers to any document or  
28 information containing AEO Materials that the government produces to

1 the defense pursuant to this Protective Order and any copies  
2 thereof.

3                   k. For each individual defendant, "Defense Team"  
4 includes (1) his counsel of record ("defense counsel"); (2) other  
5 attorneys at defense counsel's law firm who may be consulted  
6 regarding case strategy in this case; (3) defense investigators who  
7 are assisting defense counsel with this case; (4) retained experts  
8 or potential experts; and (5) paralegals, legal assistants, and  
9 other support staff to defense counsel who are providing assistance  
10 on this case (1) whom defense counsel has identified to the  
11 government in writing and (2) who have (a) signed Exhibit A to the  
12 underlying stipulation or a similar form attached thereto, (b)  
13 provided the signed exhibit to the government, and (c) filed the  
14 signed exhibit on the docket in this matter consistent with and with  
15 reference to this stipulation. The Defense Team does not include  
16 any defendant, any defendant's family members, any other associates  
17 of a defendant, or anyone who has not is signatory to this  
18 stipulation or any of its exhibits.

19                   l. For each individual defendant, "AEO Defense Team"  
20 includes defense counsel in addition to specific attorneys and/or  
21 paralegals at defense counsel's law firm who are assisting defense  
22 counsel with this case (1) whom defense counsel has identified to  
23 the government in writing and (2) who have (a) signed Exhibit A to  
24 the underlying stipulation or a similar form attached hereto, (b)  
25 provided the signed exhibit to the government, and (c) filed the  
26 signed exhibit on the docket in this matter consistent with and with  
27 reference to this stipulation. The AEO Defense Team does not  
28 include any defendant, any defendant's family members, any other

1 associates of a defendant, or anyone who has not is signatory to  
2 this stipulation or any of its exhibits.

3                 m. The government is authorized to provide defense  
4 counsel with Confidential Information marked with the following  
5 legend: "CONFIDENTIAL INFORMATION -- CONTENTS SUBJECT TO PROTECTIVE  
6 ORDER." The government may put that legend on the digital medium  
7 (such as DVD or hard drive) or simply label a digital folder on the  
8 digital medium to cover the content of that digital folder. The  
9 government may also redact any PII contained in the production of  
10 Confidential Information.

11                 n. The government is authorized to provide defense  
12 counsel with AEO Information marked with the following legend or  
13 something similar: "ATTORNEY'S EYES ONLY -- CONTENTS SUBJECT TO  
14 PROTECTIVE ORDER." The government may put that legend on the  
15 digital medium (such as DVD or hard drive) or simply label a digital  
16 folder on the digital medium to cover the content of that digital  
17 folder. The government may also redact any CI Materials, PII  
18 Materials, Privacy Act Information, Medical Materials, or AEO  
19 Materials contained in the production of AEO Information.

20                 o. If any defendant objects to a designation that  
21 material contains Confidential Information and/or AEO Information,  
22 that defendant, by and through his attorney of record, shall meet  
23 and confer with the government. If the parties cannot reach an  
24 agreement regarding the defendant's objection, said defendant may  
25 apply to the Court to have the designation removed.

26                 p. Each defendant, his Defense Team, and his AEO Defense  
27 Team shall use the Confidential Information and/or AEO Information  
28 solely to prepare for any pretrial motions, plea negotiations,

1 trial, and sentencing hearing in this case, as well as any appellate  
2 and post-conviction proceedings related to this case.

3 q. Each defendant's Defense Team shall not permit anyone  
4 other than that specific Defense Team to have possession of  
5 Confidential Information, including defendant, while outside the  
6 presence of the Defense Team.

7 r. Each defendant's AEO Defense Team shall not permit  
8 anyone other than members of that specific AEO Defense Team to see  
9 and review AEO Information at any time. At no time, under no  
10 circumstance, shall any AEO Information be shown to any defendant,  
11 or left in the possession, custody, or control of any defendant,  
12 regardless of that defendant's custody status. The AEO Defense Team  
13 shall not show, orally disclose, or share in any manner, with any  
14 defendant or any other individual or witness who is not a member of  
15 the AEO Defense Team any AEO Information.

16 s. Notwithstanding the paragraph(s) above, each  
17 defendant may see and review CI Materials only in the presence of  
18 his specific defense counsel and said defense counsel shall ensure  
19 that that defendant is never left alone with any CI Materials. At  
20 the conclusion of any meeting with a defendant at which he is  
21 permitted to view CI Materials, that defendant must return any CI  
22 Materials to his defense counsel, who shall take all such materials  
23 with counsel. That defendant may not take any CI Materials out of  
24 the room in which he is meeting with his defense counsel. At no  
25 time, under no circumstance, will any Confidential Information be  
26 left in the possession, custody, or control of any defendant,  
27 regardless of that defendant's custody status.

1 t. Notwithstanding the paragraph(s) above, each AEO  
2 Defense Team member may see and review AEO Materials only in the  
3 presence of defense counsel who is a member of that specific AEO  
4 Defense Team and said defense counsel shall ensure that that other  
5 members of the AEO Defense Team are never left alone with any AEO  
6 Materials. At the conclusion of any meeting with the AEO Defense  
7 Team at which members of the AEO Defense Team are permitted to view  
8 AEO Materials, those members of the AEO Defense Team must return any  
9 AEO Materials to defense counsel, who shall take all such materials  
10 with counsel. Those members of the AEO Defense Team may not take  
11 any AEO Materials out of the room in which he/she/they are meeting  
12 with defense counsel. At no time, under no circumstance, will any  
13 AEO Information be left in the sole possession, custody, or control  
14 of any member of the AEO Defense Team, aside from defense counsel.  
15 Aside from defense counsel, members of the AEO Defense Team may not  
16 copy, keep, maintain, or otherwise possess AEO Materials.

17 u. Each defendant may review PII Materials and Medical  
18 Materials only in the presence of a member of his specific Defense  
19 Team, who shall ensure that that defendant is never left alone with  
20 any PII Materials or Medical Materials. At the conclusion of any  
21 meeting with a defendant at which he is permitted to view PII  
22 Materials or Medical Materials, that defendant must return any PII  
23 Materials or Medical Materials to his Defense Team, and the member  
24 of the Defense Team present shall take all such materials with him  
25 or her. That defendant may not take any PII Materials or Medical  
26 Materials out of the room in which he is meeting with the Defense  
27 Team.

28

1               v.     Each defendant may see and review Confidential  
2 Information as permitted by this Protective Order, but no defendant  
3 may copy, keep, maintain, or otherwise possess any Confidential  
4 Information in this case at any time. Also, no defendant may write  
5 down or memorialize any data or information contained in the  
6 Confidential Information.

7               w.     No defendant can see, review, copy, keep, maintain,  
8 summarize, memorialize, or otherwise possess any AEO Information as  
9 defendants will have access to redacted versions of that same  
10 discovery consistent with this Protective Order.

11               x.     Members of a Defense Team may review Confidential  
12 Information with a witness or potential witness in this case,  
13 including its respective defendant; however, defense counsel must be  
14 present whenever any CI Materials are being shown to a witness or  
15 potential witness. A member of said Defense Team must be present if  
16 PII Materials or Medical Materials are being shown to a witness or  
17 potential witness. Before being shown any portion of Confidential  
18 Information, however, any defense witness or potential witness must  
19 be informed of, and agree in writing to be bound by, the  
20 requirements of the Protective Order. All such members of the  
21 Defense Team, witnesses, and proposed witnesses shall sign a  
22 signature page provided by the government consistent with Exhibit A  
23 attached to the underlying stipulation. The Defense Team shall  
24 maintain those signature pages and shall not be required to produce  
25 them absent a court order. No member of said Defense Team shall  
26 permit a defense witness or potential witness to retain Confidential  
27 Information or any notes generated from Confidential Information.

28

1           y. Members of any AEO Defense Team may not review AEO  
2 Information with anyone, including, but not limited to any  
3 witness(es), potential witness(es), and/or defendants in this case  
4 and must instead use the corresponding redacted discovery in  
5 accordance with this Protective Order. Before being shown any  
6 portion of AEO Information, any additional proposed members of the  
7 AEO Defense Team must be identified to the government, and be  
8 informed of, and agree in writing to be bound by, the requirements  
9 of the Protective Order by the applicable defense counsel. Such  
10 identification shall include signing a signature page provided by  
11 the government consistent with Exhibit A attached to the underlying  
12 stipulation. Aside from defense counsel, no members of the AEO  
13 Defense Team shall be permitted to retain AEO Information or any  
14 notes generated from AEO Information.

15           z. Each Defense Team shall maintain Confidential  
16 Information safely and securely, and shall exercise reasonable care  
17 in ensuring the confidentiality of those materials by (1) not  
18 permitting anyone other than members of the Defense Team, defendant,  
19 witnesses, and potential witnesses, as restricted above, to see  
20 Confidential Information; (2) not divulging to anyone other than  
21 members of the Defense Team, defendant, witnesses, and potential  
22 witnesses, the contents of Confidential Information; and (3) not  
23 permitting Confidential Information to be outside the Defense Team's  
24 offices, homes, vehicles, or personal presence. CI Materials shall  
25 not be left unattended in any vehicle.

26           aa. Each defense attorney shall maintain AEO Information  
27 safely and securely, and shall exercise reasonable care in ensuring  
28 the confidentiality of those materials by (1) not permitting anyone

1 other than members of their respective AEO Defense Team to see and  
2 review AEO Information; (2) not divulging to anyone other than  
3 members of their respective AEO Defense Team the contents of AEO  
4 Information; and (3) not permitting AEO Information to be outside of  
5 counsel's office(s) or personal presence. AEO Information shall not  
6 be left unattended in any vehicle.

7 bb. To the extent that a defendant, his Defense Team,  
8 witnesses, or potential witnesses create notes that contain, in  
9 whole or in part, Confidential Information, or to the extent that  
10 copies are made for authorized use by members of the Defense Team,  
11 such notes, copies, or reproductions become Confidential Information  
12 subject to the Protective Order and must be handled in accordance  
13 with the terms of the Protective Order.

14 cc. To the extent that members of an AEO Defense Team  
15 create notes that contain, in whole or in part, AEO Information, or  
16 to the extent that copies are made for authorized use by members of  
17 the AEO Defense Team, such notes, copies, or reproductions become  
18 AEO Information subject to the Protective Order and must be handled  
19 in accordance with the terms of the Protective Order.

20 dd. Each Defense Team shall use Confidential Information  
21 only for the litigation of this matter and for no other purpose.  
22 Litigation of this matter includes any appeal filed by defendant and  
23 any motion filed by defendant pursuant to 28 U.S.C. § 2255. In the  
24 event that a party needs to file Confidential Information with the  
25 Court or divulge the contents of Confidential Information in court  
26 filings, the filing should be made under seal. If the Court rejects  
27 the request to file such information under seal, the party seeking  
28 to file such information publicly shall provide advance written

1 notice to the other party to afford such party an opportunity to  
2 object or otherwise respond to such intention. If the other party  
3 does not object to the proposed filing, the party seeking to file  
4 such information shall redact any CI Materials, PII Materials, or  
5 Medical Materials and make all reasonable attempts to limit the  
6 divulging of CI Materials, PII Materials, or Medical Materials.

7               ee. Each AEO Defense Team shall use AEO Information only  
8 for the litigation of this matter, which includes any appeal filed  
9 by defendants and any motion filed by defendants pursuant to 28  
10 U.S.C. § 2255, and for no other purpose but shall not file any AEO  
11 Information without first redacting such information or, in the  
12 event that a party needs to file AEO Information with the Court or  
13 divulge the contents of AEO Information in court filings, the filing  
14 should be made under seal. If the Court rejects the request to file  
15 such information under seal, the party seeking to file such  
16 information publicly shall provide advance written notice to the  
17 other party to afford such party an opportunity to object or  
18 otherwise respond to such intention. If the other party does not  
19 object to the proposed filing, the party seeking to file such  
20 information shall redact any AEO Information and make all reasonable  
21 attempts to limit the divulging of AEO Information.

22               ff. Any Confidential Information inadvertently produced  
23 in the course of discovery prior to entry of the Protective Order  
24 shall be subject to the terms of the Protective Order. If  
25 Confidential Information was inadvertently produced prior to entry  
26 of the Protective Order without being marked "CONFIDENTIAL  
27 INFORMATION -- CONTENTS SUBJECT TO PROTECTIVE ORDER" or something  
28 similar, the government shall reproduce the material with the

1 correct designation and notify defense counsel of the error. The  
2 Defense Team shall take immediate steps to destroy the unmarked  
3 material, including any copies.

4 gg. Any AEO Information inadvertently produced in the  
5 course of discovery prior to entry of the Protective Order shall be  
6 subject to the terms of the Protective Order. If AEO Information  
7 was inadvertently produced prior to entry of the Protective Order  
8 without being marked "ATTORNEY'S EYES ONLY -- CONTENTS SUBJECT TO  
9 PROTECTIVE ORDER" or something similar, the government shall  
10 reproduce the material with the correct designation and notify  
11 defense counsel of the error. The AEO Defense Team shall take  
12 immediate steps to destroy the unmarked material, including any  
13 copies.

14 hh. If any Confidential Information contains both CI  
15 Materials and another category of Confidential Information, the  
16 information shall be handled in accordance with the CI Materials  
17 provisions of the Protective Order.

18 ii. If any AEO Information contains both AEO Materials  
19 and another category of Confidential Information, the information  
20 shall be handled in accordance with the AEO Materials provisions of  
21 the Protective Order.

22 jj. No AEO Defense Team member shall disclose the fact  
23 that an individual is a CI, CW, and/or cooperating defendant to any  
24 individual who is not also an AEO Defense Team member.

25 kk. Confidential Information shall not be used by any  
26 defendant or Defense Team, in any way, in any other matter, absent  
27 an order by this Court. All materials designated subject to the  
28 Protective Order maintained in any Defense Team's files shall remain

1 subject to the Protective Order unless and until such order is  
2 modified by this Court. Within 30 days of the conclusion of  
3 appellate and post-conviction proceedings, defense counsel shall  
4 return CI Materials to the government or certify that such materials  
5 have been destroyed. Within 30 days of the conclusion of appellate  
6 and post-conviction proceedings, defense counsel shall return all  
7 PII Materials or Medical Materials, certify that such materials have  
8 been destroyed, or certify that such materials are being kept  
9 pursuant to the California Business and Professions Code and the  
10 California Rules of Professional Conduct.

11           11. AEO Information shall not be used by the AEO Defense  
12 Team, in any way, in any other matter, absent an order by this  
13 Court. All AEO Materials designated subject to the Protective Order  
14 maintained in defense counsel's files shall remain subject to the  
15 Protective Order unless and until such order is modified by this  
16 Court. Within 30 days of the conclusion of appellate and post-  
17 conviction proceedings, defense counsel shall return AEO Materials  
18 to the government or certify that such materials have been  
19 destroyed.

20           mm. In the event that there is a substitution of counsel  
21 prior to when such documents must be returned, new defense counsel  
22 must be informed of, and agree in writing to be bound by, the  
23 requirements of the Protective Order before the undersigned defense  
24 counsel transfers any Confidential Information to the new defense  
25 counsel. New defense counsel's written agreement to be bound by the  
26 terms of the Protective Order must be returned to the Assistant U.S.  
27 Attorney(s) assigned to the case. New defense counsel then will  
28 become the Defense Team and the AEO Defense Team's custodian of

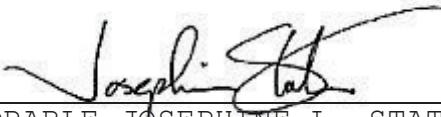
1 materials designated subject to the Protective Order and shall then  
2 become responsible, upon the conclusion of appellate and post-  
3 conviction proceedings, for: (1) returning to the government,  
4 certifying the destruction of, or retaining pursuant to the  
5 California Business and Professions Code and the California Rules of  
6 Professional Conduct all PII Materials or Medical Materials; and  
7 (2) returning to the government or certifying the destruction of all  
8 CI Materials and AEO Materials.

9           nn. Defense counsel shall advise their respective  
10 defendant and all members of their Defense Team and AEO Defense Team  
11 of their obligations under the Protective Order and ensure their  
12 agreement to follow the Protective Order, prior to providing  
13 defendant, members of the Defense Team, and/or members of the AEO  
14 Defense Team with access to any materials subject to the Protective  
15 Order.

16           IT IS SO ORDERED.

17           September 8, 2025

18           \_\_\_\_\_  
19 DATE

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HONORABLE JOSEPHINE L. STATON  
UNITED STATES DISTRICT JUDGE